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**Via ECF and Email**

The Honorable Analisa Torres  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Energy Transportation Group, Inc. v. Borealis Maritime Limited,*  
*Case No. 1:21-cv-10969-AT-JW*  
*Request to File Summary Judgment Papers Under Provisional Seal*

Dear Judge Torres:

I represent Plaintiff Energy Transportation Group, Inc. (“ETG”) in the above-captioned matter. I am writing to respectfully request that the Court permit ETG to provisionally file under seal its papers in opposition to Defendant’s motion for summary judgment and in support of Plaintiff’s motion for partial summary judgment, *i.e.*, its memorandum of law, reply declaration and exhibits, and response to Borealis’ Rule 56.1 Statement. These submissions are due today (ECF Nos. 210-211) and will be filed shortly. They contain information that Defendant Borealis Maritime Limited (“Borealis”) previously has designated confidential pursuant to the confidentiality order in this action.

Accordingly, in order to protect any legitimately confidential information contained in ETG’s summary judgment papers, and in line with similar requests for temporary sealing that have been made in the course of this action, I respectfully request that I be permitted to file ETG’s supporting papers under provisional seal, and that Borealis be provided with three weeks (or such other amount of time as the Court deems reasonable) to review the filings, identify any portions that it believes should be maintained under seal, and, if needed, to file a letter motion to seal after a meet and confer between counsel. ETG respectfully reserves the right to file a written response to Borealis’ motion to seal, opposing any portions of such motion with which ETG may disagree.

Respectfully yours,

/s/Lloyd S. Clareman  
Attorney for Plaintiff ETG